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6 UNITED STATES BANKRUPTCY COURT

7 NORTHSIDE DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

8
9 In re
10 PG&E Corporation,
11 and
12 PACIFIC GAS AND ELECTRIC
13 COMPANY,
14 Debtors.

15 [] Affects PG&E Corporation
16 [] Affects Pacific Gas and Electric Company
17 [x] Affects both Debtors

18 *All papers shall be filed in the Lead Case,
19 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**MOTION FOR RELIEF FROM
AUTOMATIC STAY TO PERMIT THE
COURTS OF THE STATE OF
CALIFORNIA TO CONDUCT A JURY
TRIAL AND RELATED PRETRIAL AND
POST TRIAL MATTERS IN
CONNECTION WITH CREDITOR, JOHN
LEE CLARK'S COMPLAINT FOR
DAMAGES, OR IN ALTERNATIVE, FOR
ABSTENTION**

Date: July 7, 2020
Time: 10:00 a.m.
Place: Courtroom 17450 Golden Gate
Avenue, 16th Floor
San Francisco, CA
Judge: Hon. Dennis Montali

Objection Deadline: July 2, 2020, 4:00 p.m.
Pacific Standard Time

23 Creditor, John Lee Clark ("Mr. Clark") hereby respectfully submits this Motion for Relief
24 from the Automatic Stay to Permit the Courts of the State of California to Conduct a Jury Trial
25 and Related Pretrial and Post Trial Matters in Connection with Creditor, John Lee Clark's
26 Complaint for Damages, or in Alternative, for Abstention (the "Motion") pursuant to 11 U.S.C.
27 Section 362(d), for cause, or in the alternative for abstention pursuant to 28 U.S.C. Section
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1 | 1334(c)(1).

This Motion seeks the entry of an order granting relief from the automatic stay to allow Mr. Clark to prosecute his Complaint for Damages filed with the Superior Court of the State of California, in and for the County of San Francisco, on July 10, 2018, which includes causes of action for: negligence, premises liability, public nuisance, inverse condemnation, trespass, and private nuisance claims against PG&E Corporation and Pacific Gas and Electric Company (collectively the "Debtors"), arising from the explosion and fire that occurred on January 12, 2017, at real property located on 2209 South George Washington Boulevard, Yuba City, California. The Complaint alleges that the Explosion was caused due to the Debtors' endemic failure to maintain certain gas distribution lines and resulted in catastrophic injuries and loss of real and personal property of Mr. Clark.

12 This Motion seeks an order to allow Mr. Clark to proceed against the Debtors, in order to
13 establish the liability of the Debtors, obtain judgment(s) against the Debtors, and collect any
14 judgment(s) obtained against the Debtors from the Debtors and/or their insurers, as applicable. In
15 the alternative, Mr. Clark respectfully requests the Court to abstain from deciding the validity and
16 amount of his claims against the Debtors, in favor of the Courts of the State of California.

17 | DATED: June 15, 2020

DOWNEY BRAND LLP

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By:

/s/ Jamie P. Dreher

JAMIE P. DREHER

Attorneys for John Lee Clark